

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of New Mexico



JUN 13 2025

United States of America

v.

Grzegorz Vandenberg

Case No. 25-2303 MJ

MITCHELL R. ELFERS
CLERK OF COURT

Defendant(s)

AMENDED
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 12, 2025 in the county of Hidalgo in the
District of New Mexico, the defendant(s) violated:

Code Section

18 U.S.C § 844(d)

Offense Description

transport[] or receive[], or attempt[] to transport or receive, in interstate or foreign commerce any explosive with the knowledge or intent that it will be used to kill, injure or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property

This criminal complaint is based on these facts:

See attachment.

☒ Continued on the attached sheet.

Complainant's signature

Lilly Aldana, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

- by telephone. JHR

Date: 06/13/2025

Judge's signature

City and state: Las Cruces, New Mexico

Jerry H. Ritter, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lilly Aldana, being first duly sworn, hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 2024. I have gained experience through training and everyday work relating to conducting these types of investigations. Prior to becoming an FBI Special Agent, I earned both a bachelor's and a master's degree in Criminal Justice. I am classified, trained, and employed as a federal law enforcement officer with statutory arrest authority charged with conducting criminal investigations of alleged violations of federal criminal statutes, including Title 18 of the United States Code. I am currently assigned to the Albuquerque Field Office, Las Cruces Resident Agency, in New Mexico. Prior to my current position, I was employed for three years as a Federal Probation Officer with the United States Probation Office in the Western District of Texas. I am currently assigned to investigate violations of federal law.

2. The information contained herein is based upon my investigation as well as information supplied to me by other duly sworn law enforcement officers, and does not contain all information known to me, only facts for consideration of probable cause. I make this affidavit in support of a criminal complaint that there is probable cause to find that Grzegorz Vandenberg violated 18 U.S.C. § 844(d).

Relevant Statutes

3. Title 18 U.S.C. § 844(d) makes it a crime for someone to "transport[] or receive[], or attempt[] to transport or receive, in interstate or foreign commerce any explosive with the knowledge or intent that it will be used to kill, injure or intimidate any individual or unlawfully to damage or destroy any building, vehicle, or other real or personal property . . ." Violations of 18 U.S.C. § 844(d) are punishable by imprisonment "for not more than ten years, or fined under this

title, or both; and if personal injury results to any person, including any public safety officer performing duties as a direct or proximate result of conduct prohibited by this subsection, shall be imprisoned for not more than twenty years or fined under this title, or both; and if death results to any person, including any public safety officer performing duties as a direct or proximate results of conduct prohibited by this subsection, shall be subject to imprisonment for any term of years, or to the death penalty or to life imprisonment.”

Details of the Investigation

4. On June 12, 2025, Grzegorz Vandenberg went to a travel center in Lordsburg, NM, to purchase fireworks. While he was there, he requested assistance to select fireworks that could be thrown directly at people to cause harm. Vandenberg expressed that he was prior special forces military and could make pipe bombs. Vandenberg informed the cashier that he would be traveling to Los Angeles, California for the riots to kill law enforcement officers or government officials.

5. On June 12, 2025, FBI Special Agent Lilly Aldana interviewed the store cashier who provided the following information:

6. On June 12, 2025, at approximately 3:30 p.m., Vandenberg asked the cashier for assistance in selecting fireworks. Vandenberg asked the cashier what their biggest explosives were that he could purchase. Vandenberg expressed that he was prior military and wanted to purchase fireworks that could cause harm. Vandenberg asked the cashier to join him and his platoon that was waiting to meet with him in California. Vandenberg informed the cashier that he had mortar explosives with him and was planning to utilize them at the riots to kill officers.

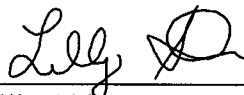
7. On June 12, 2025, FBI SA Aldana interviewed the store manager who provided the following information:

8. On June 12, 2025, at approximately 3:30 p.m., the store manager was in her office when she overheard the cashier instructing a client that it would not be safe to throw the fireworks at people. The manager went out to the register to provide support for what she had just overheard. The manager saw Vandenberg's military identification and wanted to hold it to verify the age. However, Vandenberg did not let go of his identification and asked if the manager wanted to trace it. Vandenberg purchased six mortars that hold 60 grams of gun powder each, and 36 large fireworks. After Vandenberg made his purchase, the cashier did not feel comfortable and followed Vandenberg to obtain his vehicle license plate information. The cashier observed Vandenberg driving off in a Silver Ford Bronco with Montana license plate 660026D, heading west on Interstate 10 towards California.

9. Based on the foregoing, I submit that probable cause exists to believe that Grzegorz Vandenberg violated 18 U.S.C. § 844(d) by transporting or receiving, or attempting to transport or receive, in interstate or foreign commerce any explosive with the knowledge or intent that it would be used to kill, injure, or intimidate any individual of the United States.

This affidavit reviewed by AUSA Joni Stahl.

Respectfully submitted,



Lilly Aldana
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on June 13, 2025.



Honorable Jerry H. Ritter
UNITED STATES MAGISTRATE JUDGE

- by telephone. JHR